

IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF NORTH CAROLINA
Case No.: 1:24-cv-881-LCB-JEP

JURYX, LLC,

Plaintiff,

v.

**LAUREN E. KULP; TANDEM
LEGAL SOLUTIONS LLC,**

Defendants.

**JOINT LOCAL RULE 5.5.
REPORT FOR THE FILING OF
SEALED DOCUMENTS**

Pursuant to Local Rule 5.4(b)(1)(b), the necessary Parties have met and conferred within 10 days of the filing of the first Motion to File Certain Exhibits Under Seal, (Dkt. 2), and hereby submit this Joint Local Rule 5.5 Report. Given the early posture of the case, the Parties' discussions focused on confidentiality and sealing issues arising out of Plaintiff's Verified Complaint and Motion to File Certain Exhibits Under Seal.

1. **Conference.** Pursuant to Local Rule 5.4(b)(1), counsel for Plaintiff and counsel for Defendants conferred by videoconference on October 31, 2024, to discuss, among other things, the issues of confidentiality raised in this case. That discussion included the alleged trade secret and proprietary nature of the confidential information contained in certain exhibits to Plaintiff's Verified Complaint (Dkt. 1) that Plaintiff filed under seal (Dkt. 5). Defendants' counsel

stipulated in writing to keep the sealed materials “Highly Confidential – Outside Counsel Attorneys’ Eyes’ Only,” with the understanding that such stipulation is not an admission by Defendants that any of the sealed documents are appropriate for sealing and that Defendants’ counsel might choose to later challenge that designation should Defendants’ counsel believe such challenge to be appropriate. Having since reviewed the sealed documents, Defendants do not object to the sealing of those documents but reserve the right to challenge the “Highly Confidential – Outside Counsel Attorneys’ Eyes’ Only” designation of the documents consistent with the procedure for challenging designations to be set forth later in a proposed stipulated protective order. Counsel for the Parties agree to meet and confer further regarding the nature of any confidential documents that may be involved in the case, the possibility of using stipulations to avoid the need to file certain documents under seal, and the possibility of agreed-upon redactions of immaterial confidential information in filings to avoid the need for filing documents under seal.

2. **Non-Parties.** While this case is in the earliest stages of litigation, there are currently no anticipated documents from non-parties that will require filing under seal.

3. **Alternative Proposal for Cases with Many Confidential Documents.** The Parties agree that this case likely will involve significant

amounts of detailed information and descriptions about documents, materials, and other information that Plaintiff contends are trade secrets and proprietary business information and for which Plaintiff seeks protection and believes sealing is appropriate. The Parties will continue to meet and confer regarding potential alternative procedures for managing motions to seal that minimize the filing of sealed documents, protect public right of access, and allow for the review of motions to seal in a way that reduces cost, time, and confusion. The Parties will file an updated Local Rule 5.5 Report with any proposed alternative sealing procedures as appropriate. Unless and until an updated Local Rule 5.5 Report is filed, the Parties intend to use the default procedures for filing under seal set out in Local Rule 5.4(c).

This the 1st day of November 2024.

/s/ Kelly M. Dagger
Kelly Margolis Dagger
N.C. State Bar No. 44329
kelly.dagger@elliswinters.com
Scottie Forbes Lee
N.C. State Bar No. 50833
scottie.lee@elliswinters.com
Peter N. Borden
N.C. State Bar No. 53389
peter.borden@elliswinters.com

/s/ Patrick M. Kane
Patrick M. Kane
N.C. State Bar No. 36861
pkane@foxrothschild.com
Ashley Barton Chandler
N.C State Bar No. 53381
AChandler@foxrothschild.com
La-Deidre D. Matthews
N.C. State Bar No. 54358
lmatthews@foxrothschild.com

ELLIS & WINTERS LLP
P.O. Box 33550
Raleigh, NC 27636
Telephone: (919) 865-7000
Facsimile: (919) 865-7010

*Counsel for Defendants
Lauren Kulp and Tandem
Legal Solutions, LLC*

FOX ROTHSCHILD LLP
230 N. Elm Street, Suite 1200
PO Box 21927 (27420)
Greensboro, NC 27401
Telephone: 336.378.5200
Facsimile: 336.378.5400

/s/Margaret A. Gisch
Margaret A. Gisch
magisch@gct.law

GOLAN CHRISTIE TAGLIA LLP
70 West Madison Street
Suite 1500
Chicago, IL 60602-4206
Telephone: 312.263.2300
**Special appearance under Local
Rule 83.1(d) forthcoming*

Counsel for Plaintiff Jury-X LLC